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Attorneys for Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re:
 USA COMMERCIAL MORTGAGE COMPANY,
 Debtor.

Case No. BK-S-06-10725 LBR
 Case No. BK-S-06-10726 LBR
 Case No. BK-S-06-10727 LBR
 Case No. BK-S-06-10728 LBR
 Case No. BK-S-06-10729 LBR

In re:
 USA CAPITAL REALTY ADVISORS, LLC,
 Debtor.

Chapter 11

In re:
 USA CAPITAL DIVERSIFIED TRUST DEED FUND, LLC,
 Debtor.

Jointly Administered Under
 Case No. BK-S-06-10725 LBR

In re:
 USA CAPITAL FIRST TRUST DEED FUND, LLC,
 Debtor.

In re:
 USA SECURITIES, LLC,
 Debtor.

**DEBTORS' SUPPLEMENTAL
 RESPONSE TO JOINT MOTION OF
 COMMITTEES PURSUANT TO 11 U.S.C.
 § 105(a), 107(b) 1102(b)(3)(A) AND 1103(c),
 FOR NUNC PRO TUNC ORDER
 CLARIFYING REQUIREMENT TO
 PROVIDE ACCESS TO INFORMATION
 (AFFECTS ALL DEBTORS)**

Affects:

- ☒ All Debtors
☐ USA Commercial Mortgage Company
☐ USA Securities, LLC
☐ USA Capital Realty Advisors, LLC
☐ USA Capital Diversified Trust Deed Fund, LLC
☐ USA First Trust Deed Fund, LLC

Date: June 21, 2006
 Time: 9:30 a.m.

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Debtors USA Commercial Mortgage Company, USA Securities, LLC, USA Capital Realty Advisors, LLC, USA Capital Diversified Trust Deed Fund, and USA Capital First Trust Deed Fund (collectively referred to as "Debtors"), by and through their counsel, hereby supplement their response to the Joint Motion of Committees Pursuant to 11 U.S.C. § 105(a), 107(b) 1102(b)(3)(A) and 1103(c), for Nunc Pro Tunc Order Clarifying Requirement to Provide Access to Information (the "Access to Information Motion") (docket no. 521, filed June 7, 2006).

The Debtors' position on the proper definition of "confidential information" for purposes of the Committees' motion for a confidentiality protocol would include:

"[I]nformation that constitutes proprietary information or trade secrets or contains non-public information concerning the Company's business operation, projections, analyses, compilations, studies prepared by the Company or its advisors" (taken from the ECC's proposed Confidentiality Agreement which we filed as an exhibit to Debtors' Supplemental Response (docket no. 643, filed 6/14/06) to the Committees' motion), but would also specifically include: ***(1) real property appraisals prepared by Hilco and summaries of such appraisals (we will not disclose the actual appraisals but only appraisal summaries, and we will disclose them only to the Committees' Professionals, not to Committee members); (2) information or documentation related to the Debtors' negotiations with borrowers regarding loans serviced by the Company; (3) information or documentation related to the Debtors' negotiations with the Committees regarding any plans of reorganization or other sensitive case issues; and (4) information or documentation related to evaluating and litigating potential causes of action on behalf of one or more of the Debtors' estates.***

Nothing in the definition of Confidential Information or the order granting the Access to Information Motion should preclude the Debtors from withholding and protecting information and documentation that is protected by the attorney/client privilege (including but not limited to any applicable common-interest privilege) or the attorney work product doctrine.

1 **CONCLUSION**

2 Based on the foregoing, Debtors respectfully request that the Access to Information
3 Motion be granted subject to the limitations set forth herein.

4 Respectfully submitted this 20th day of June, 2006

5 /s/ Lenard E. Schwartzer

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